

Total Maximum Daily Load (TMDL)

For

pH Exceedences in

Buffalo Creek, GA

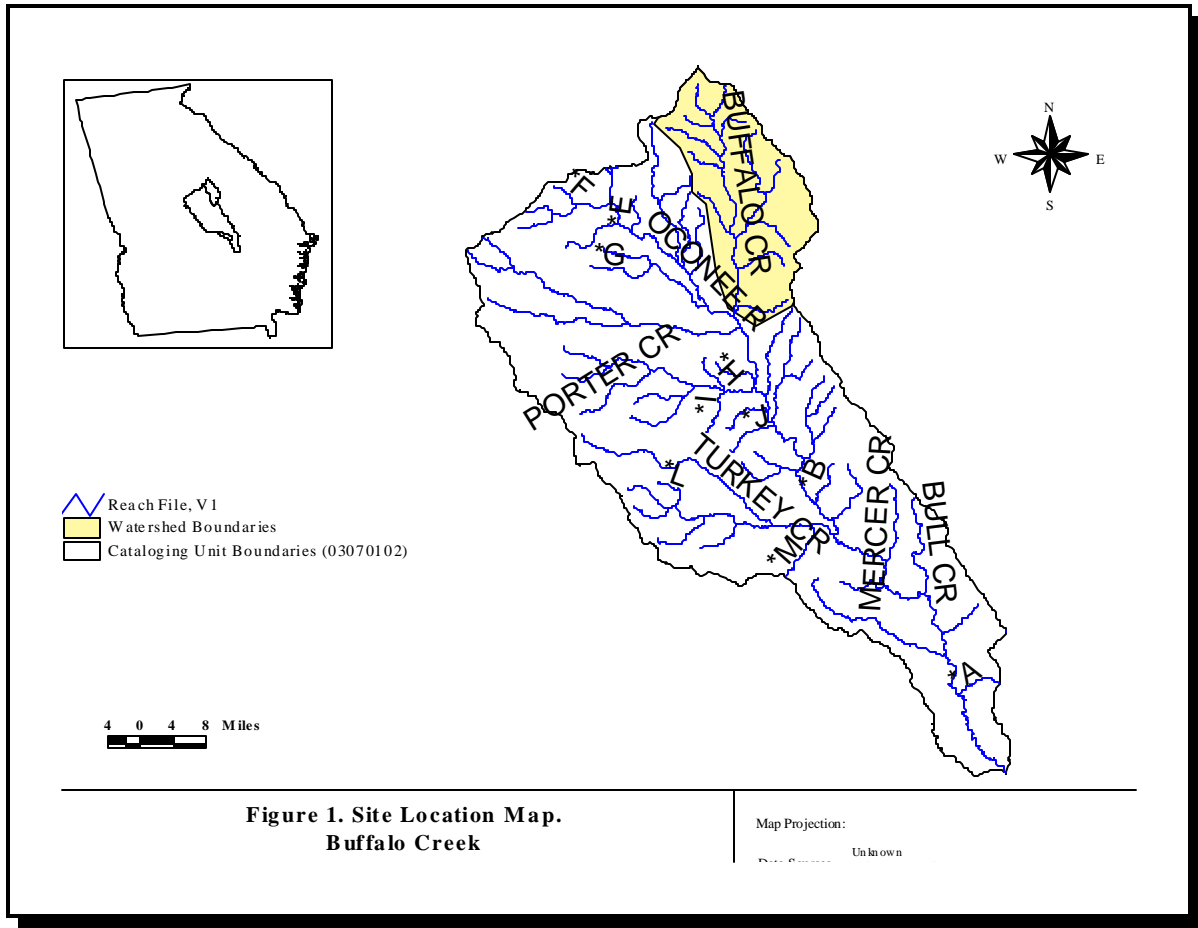
(From Keg Creek to the Oconee River)



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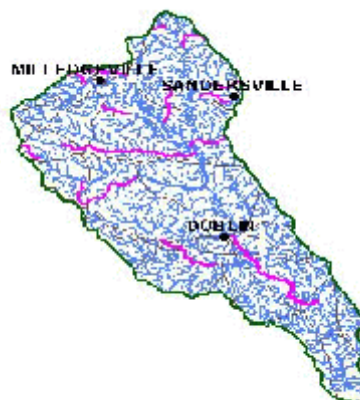
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Figure 1- Buffalo Creek Watershed



TMDL at a Glance

Basin Name/Subbasin:	Oconee Basin/Lower Oconee Subbasin (3070102)
Waterbody of Concern:	Buffalo Creek (Keg Creek to Oconee River)
Pollutant:	pH
Designated Use:	Fishing
Size of Waterbody:	11 Miles
Water Quality Standards:	6.5 to 8.5 standard units
TMDL Target:	6.0 to 8.5 standard units
Wasteload Allocation:	6.0 to 8.5 standard units
Load Allocation:	6.0 to 8.5 standard units
Margin of Safety:	Not Applicable



Executive Summary

A segment of Buffalo Creek (from Keg Creek to Oconee River) has been placed on the State of Georgia Section 303(d) list of impaired waters due to pH excursions. pH (or hydrogen ion concentration) is a measure of acidity and alkalinity of a given solution. The measure of pH is on a number scale from 0 to 14, where a pH of 7 represents neutrality. pH numbers lower than 7 represent increasing acidity, while a pH of greater than 7 represent increasing alkalinity. The pH of water determines the solubility (amount that can be dissolved in the water) and biological availability (amount that can be utilized by aquatic life) of chemical constituents.

The applicable water quality criterion for pH, as described in State of Georgia's Rules and Regulation for Water Quality Control, is 6.0 to 8.5. Effluent data from a discharger in the Buffalo Creek drainage shows pH violations occurring outside of the time period when instream pH violations occur. Therefore, it is unknown if pH violations are the result of point or non-point source activities in the watershed or due to natural pH excursions. Because of the lack of data/information regarding the pollutant and pollutant source(s) causing or contributing to the instream pH violations, this TMDL will be a phased TMDL whereby additional information should be collected to determine the pollutant and pollutant source(s) causing the water quality problem.

Because pH is not a load, but rather a measure of acidity and/or alkalinity of a given solution, this TMDL uses an *other appropriate measure* (40 CFR § 130.2(i)) rather than an actual mass-per-unit time measure. For this TMDL, the state's numeric pH criterion (6.0 to 8.5) is used as the TMDL target (*other appropriate measure*). Thus, the TMDL ensures both point and non-point sources activities meet the pH criterion at the point of discharge to Buffalo Creek. Any new dischargers to Buffalo Creek should be required to meet the 6.0 to 8.5 criterion at the point of discharge.

Introduction

TMDLs are required for impaired waters on a State's Section 303(d) list as described in Federal Clean Water Act Section 303(d) and 40 CFR 130. A TMDL specifies the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards. The TMDL allocates pollutant loadings among point and non-point pollutant sources. Point sources receive wasteload allocations (WLAs) which are regulated by the National Pollutant Discharge Elimination System (NPDES) Program, while non-point sources receive load allocations (LAs) for non-point sources activities. The WLAs and LAs in the TMDL provide a basis for states to reduce loadings from both point and non-point sources that will lead to attainment of the applicable water quality criterion.

Establishment of this TMDL satisfies the consent decree obligation established in *Sierra Club v. EPA*, Civil Action No: 94-CV-2501-MHS (N.D. GA). The Consent Decree requires TMDLs to be developed for all waters on Georgia's current Section 303(d) list consistent with the schedule established by Georgia for its rotating basin management approach.

Watershed Characterization

Landuse / Land Ownership

The Buffalo Creek watershed is located in the Oconee River Basin in both Washington and Hancock counties. Populated towns near Buffalo Creek include the towns of Deerstep (population 128), Oconee (population 260), Sandersville (population 6290), and Sparta (population 1710). Landuse in the Buffalo Creek watershed is comprised mostly of deciduous and evergreen forest (Table 1).

Table 1 - Landuse in the Buffalo Creek Watershed

Landuse	Percent Area
Bare Rock/Sand/Clay	0.1
Deciduous Forest	35.6
Emergent Herbaceous Wetlands	0.1
Evergreen Forest	26.9
High Intensity Commercial/Industrial/Transportation	0.5
High Intensity Residential	0.1
Low Intensity Residential	0.7
Mixed Forest	10.5
Open Water	0.6
Other Grasses (Urban/recreational; e.g. parks law	0.1
Pasture/Hay	2.1
Quarries/Strip Mines/Gravel Pits	2.7
Row Crops	8.0
Transitional	6.4
Woody Wetlands	5.5

Soils

Soils in the Buffalo Creek watershed are comprised of mostly sandy and silt loam soils. As shown in Figure 2, soils in the Buffalo Creek watershed are acidic with pH ranging from 4.85 to 6.09.

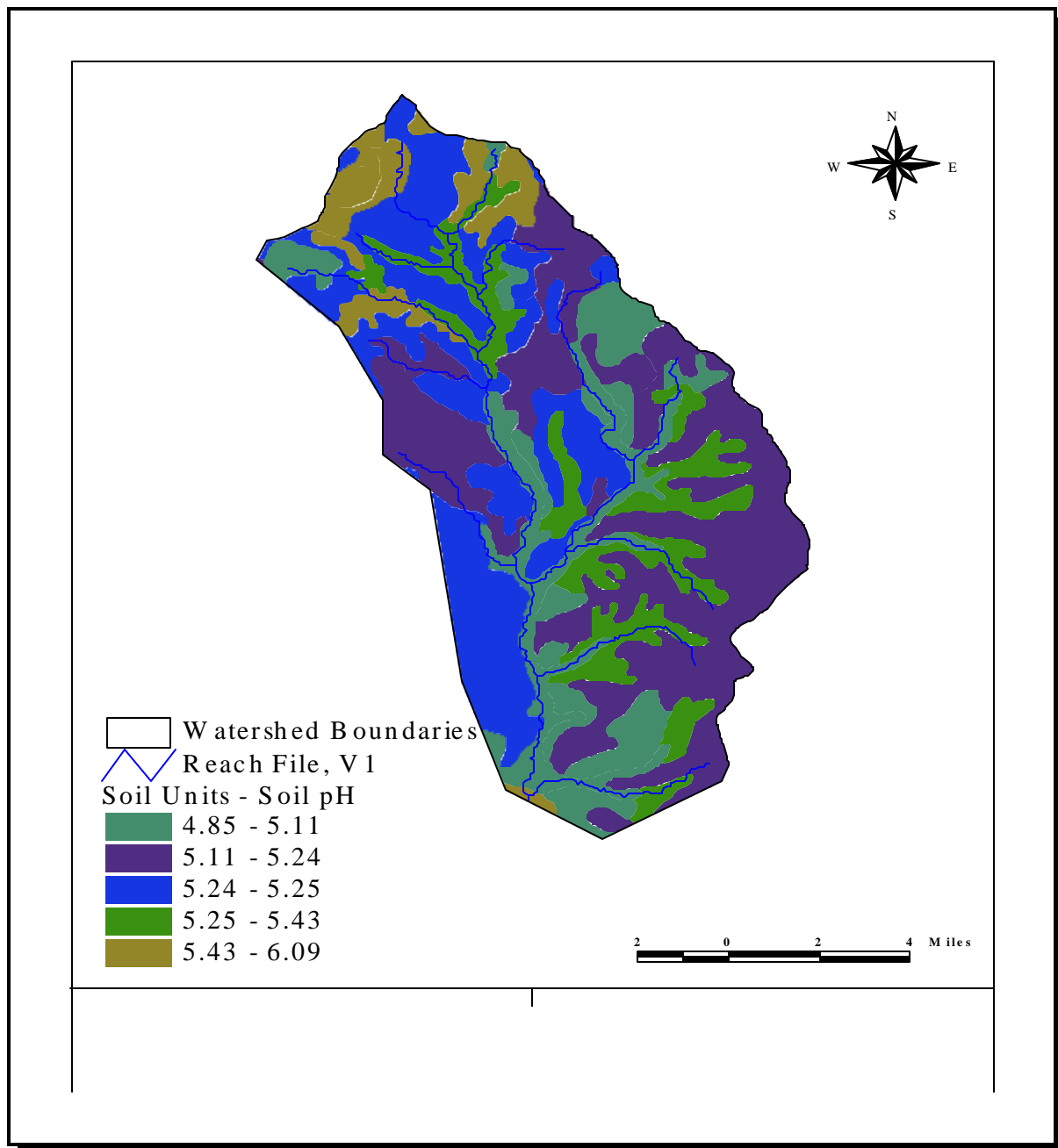


Figure 2 - Soil pH in Buffalo Creek Drainage

Climate

Climatic patterns in the Oconee River Basin (Milledgeville Weather Station) are summarized in Figure 3, shown below. Precipitation in the Oconee River basin is generally highest in the late winter-early spring and summer periods and lowest in the fall. Air temperatures in this basin are generally lower in late fall and winter and increase sharply in February to peak in the months of June and July.

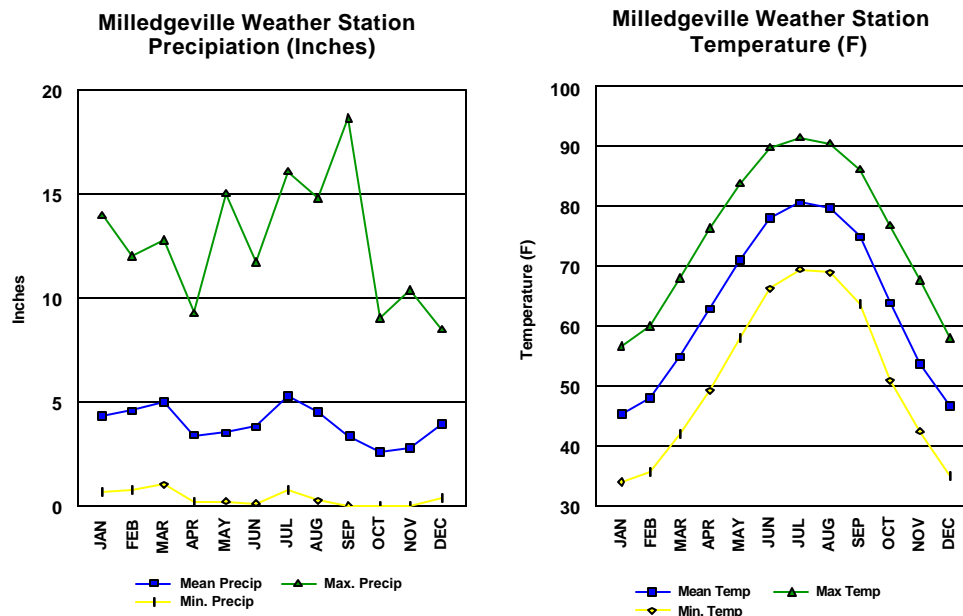


Figure 3 - Climate Patterns in the Oconee River Basin

Hydrology/Streamflow

USGS has collected streamflow data in the Buffalo Creek watershed from 1993 through 1996 (Figure 4). Streamflow in Buffalo Creek is characterized by peak flows generally occurring during late-fall and winter and low flows generally occurring during the summer periods. Peak flow in the Buffalo Creek watershed also occur in response to episodic storm events which are common in the southeast.

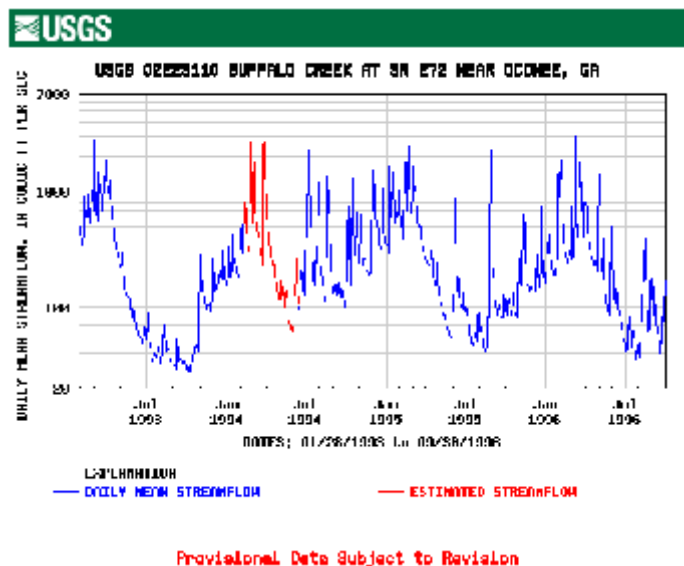


Figure 4 - Streamflow in Buffalo Creek Watershed

Problem Definition

Georgia has identified a portion of Buffalo Creek (from the confluence of Key Creek down to the Oconee River) (Figure 1) as not meeting the State of Georgia's water quality criterion for pH. One of the most significant environmental impacts of pH is the effect that it has on the solubility and thus the bioavailability of other substances. As the pH falls (solution becomes more acidic) many insoluble substances become more soluble and thus available for absorption.

Applicable Water Quality Standard

The State of Georgia's Rules and Regulations for Water Quality Control Chapter 391-3-6.03(6)(c)(II) include a numeric water quality standard for pH of 6.0 to 8.5. This TMDL will be established at a level to ensure compliance with the applicable water quality criterion and protection of the beneficial use.

Available Monitoring Data

pH measurements (instantaneous measurements) in Buffalo Creek were taken in 1996 (June through September) and 1999 (January through December). This data shows that 36% of the measurements exceeded the pH criterion in 1996, while 40% exceeded the criterion in 1999 (Table 2).

Table 2 - pH Exceedences

	Number of Samples	Number of Exceedences	Percent Exceedence
1996	11	4	36.36%
1999	20	8	40.00%
Total	31	12	38.71%

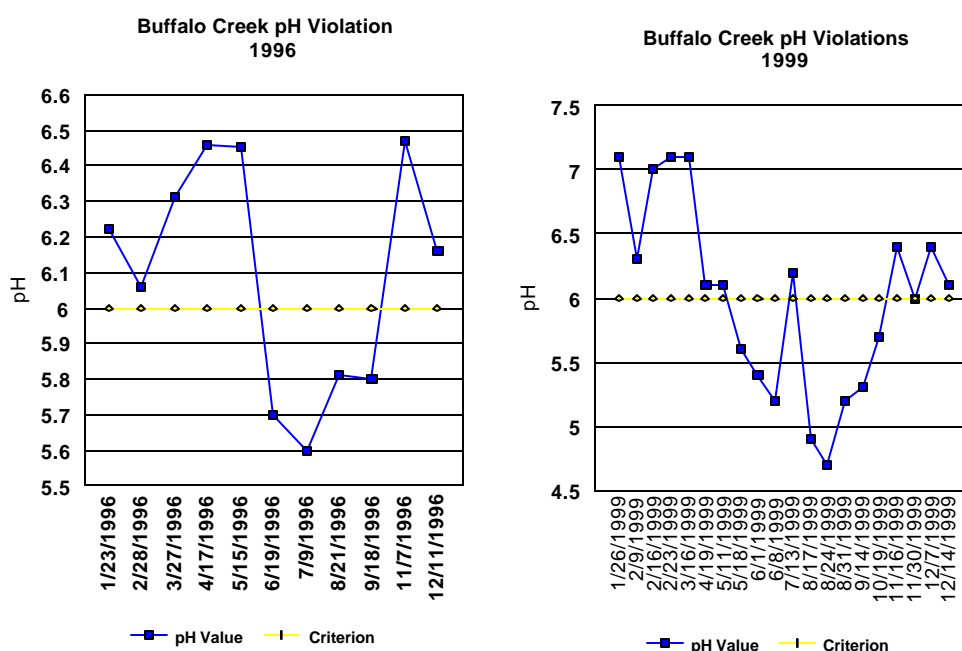


Figure 5 - pH Violations in Buffalo Creek

Figure 5 shows that the pH violations in Buffalo Creek in both 1996 and 1999 occurred during summertime low flow conditions (June through September).

Based on the data presented above, the critical condition in Buffalo Creek which may lead to impacts to the designated beneficial use is summer low flow conditions. This condition generally exists during the summer period when precipitation is limited and the creek flow becomes effluent dominated.

Source Identification

The TMDL focuses on identifying those controllable pH altering sources in the Buffalo Creek watershed. In doing this, the TMDL identifies both point and potential non-point sources.

Point Sources

An evaluation of current point source discharges to Buffalo Creek was developed to determine if any point source has violated its discharge limits for pH during the critical low period. As shown in Table 3 below, three discharges are permitted to discharge to Buffalo Creek (or tributaries which lead to Buffalo Creek). Each of these dischargers presently have NPDES permit limits which allow the effluent pH concentration to range from 6.0 to 9.0.

Table 3 - Identified NPDES Permitted Dischargers

Point Sources	NPDES Permit	pH Limit	Receiving Waterbody
Sparta WPCP*	GA0025593	6.0 - 9.0	Buffalo Creek
Sandersville WPCP*	GA0032051	6.0 - 9.0	Taynard/Limestone/Buffalo Creek
Imerys Pigments Inc.	GA0046330	6.0 - 9.0	Tributary to Buffalo Creek

*WPCP=Water Pollution Control Plants

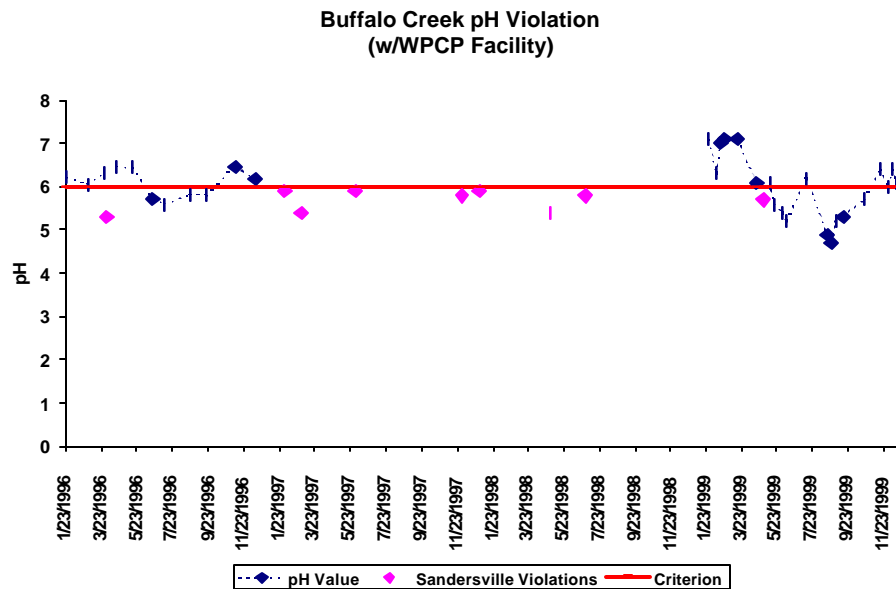


Figure 6 - Sandersville pH Violations

A five year compliance history (Appendix A) for each of above listed facilities show that the Sandersville Water Pollution Control Plant (WPCP) is the only facility with NPDES permit violations. All of these low end pH violations (pH less than 6.0) have occurred over a three year period from 1996 - 1999. Although the discharge from the Sandersville WPCP shows violations of the lower bound pH criterion on multiple occasion (Figure 6), the time period when the pH exceedences occur does not coincide with the sag in pH. Therefore, there is limited data/information to determine if pH violations from the Sandersville WPCP are the cause of the pH exceedences in Buffalo Creek. Additional water quality monitoring data should be collected to determine what effect, if any, the Sandersville WPCP has on Buffalo Creek.

Non-Point Sources

There are potential non-point sources that could cause or contribute to exceedences of the pH criterion in Buffalo Creek. Presently no information is available to adequately characterize non-point source loads which may impact pH.

Total Maximum Daily Load (TMDL)

A TMDL establishes the total pollutant load a waterbody can receive and still achieve water quality standards. The components of a TMDL include a wasteload allocation (WLA) for point sources and a load allocation (LA) for non-point sources (including natural background) and a margin of safety (MOS) to account for uncertainty. Because pH is not a load, but rather a measure of acidity and/or alkalinity of a given solution, this TMDL uses an *other appropriate measure* (40 CFR § 130.2(i)) rather than an actual mass-per-unit time measure. For this TMDL, the State's numeric pH criterion (6.0 to 8.5) is used as the TMDL target (*other appropriate measure*). Thus, the TMDL ensures that both point and non-point source activities meet the pH criterion at the point of discharge.

Point Sources

The contribution from point source discharges was considered for Buffalo Creek. Effluent pH levels from the point sources discharging into Buffalo Creek shall be between 6.0 and 8.5 standard units at the point of discharge. Implementation and/or enforcement of these allocations should occur as a part of the NPDES permitting and/or enforcement process. All new NPDES permits issued within the Buffalo Creek drainage should ensure that the WLA of 6.0 to 8.5 is met.

Table 4 - TMDL Targets for Point Source Discharges to Buffalo Creek

Point Sources	NPDES Permit	Wasteload Allocation
Sparta WPCP	GA0025593	6.0 to 8.5
Sandersville WPCP	GA0032051	6.0 to 8.5
Imerys Pigments Inc.	GA0046330	6.0 to 8.5

Non-point Sources

Because it is unknown what pollutant or pollutant sources are causing or contributing to pH violations in Buffalo Creek, the pH TMDL target for non-point source(s) in the Buffalo Creek watershed is 6.0 and 8.5 standard units.

Margin of Safety

The margin of safety in TMDL development is used to account for the lack of knowledge concerning the relationship between the pollutant loads and the quality of the receiving waterbody. The targets used for this TMDL ensures that loads from the point source and loads originating from non-point source activities must individually meet the pH target of 6.0 to 8.5. As long as pH from both point and non-point source activities are consistent with the TMDL target, water quality standards in Buffalo Creek will be met. Therefore, an additional consideration of a margin of safety for Buffalo Creek was determined unnecessary.

Seasonal Variation

Based on the limited pH data, a seasonal fluctuation in pH was observed. Low pH generally occurred in the summer, while pH values above the criterion occurred throughout the remaining portion of the year. Because the available data set is limited to less than a full year, and the data was collected during a five year statewide drought, additional consideration of seasonal variation was determined unnecessary.

TMDL Implementation

EPA has always recognized that implementation of TMDLs is important, since a TMDL improves water quality when the pollutant allocations are implemented, not when a TMDL is established. EPA believes, however, that TMDL implementation – and implementation planning – is the responsibility of the State of Georgia, through its administration of the National Pollutant Discharge Elimination System (NPDES) point source permit program and through its administration of any regulatory or non-regulatory nonpoint source control programs. Neither the Clean Water Act nor EPA's current regulations require a TMDL to include an implementation plan.

A consent decree in the case of Sierra Club v. EPA, 1:94-cv-2501-MHS (N.D. Ga.) requires the State or EPA to develop TMDLs for all waterbodies on the State of Georgia's current 303(d) list according to a schedule contained in the decree. On July 24, 2001, the district court entered an order finding that the decree also requires EPA to develop TMDL implementation plans. EPA disagrees with the court's conclusion that implementation plans are required by the decree and has appealed the July 24, 2001, order.

The Agency is moving forward, however, to comply with the obligations contained in the order. Since EPA does not believe it is possible to propose an adequate plan in the time available between July 24, 2001 and the proposal of this TMDL, this proposal outlines the steps EPA intends to undertake to develop an implementation plan before the TMDL is established.

Between now and the time this TMDL is established, EPA intends to coordinate with the Georgia Environmental Protection Division to prepare an implementation plan for this TMDL. EPA will work with the Georgia Environmental Protection Division to facilitate stakeholder involvement in this process, including members of the public and appropriate units of local, state, and federal government. EPA will make its best efforts to afford the public an opportunity to provide comments about an implementation plan before it is finalized. If the July 24, 2001 Order is vacated, EPA would expect to support efforts by the State of Georgia to develop an implementation plan for this TMDL.

References

1. Georgia Department of Natural Resources, 2000 Section 303(d) List
2. Sierra Club v. EPA & Hankinson USDC-ND-GA Atlanta Div. #1: 94-CV-2051-MHS
3. Georgia Department of Natural Resources, Rules and Regulations for Water Quality Control, Water Use Classifications and Water Quality Standards, Revised 2001.
4. Mississippi Department of Environmental Quality, TMDL for Low pH in the Big Black River, Big Black River Basin, Madison & Yahoo Counties, Mississippi
5. Mississippi Department of Environmental Quality, TMDL for Low pH in Turkey Creek, Coastal Streams Basin, Harrison Counties, Mississippi
6. USGS Website (www.usgs.gov)
7. USEPA. Guidance for Water Quality-based Decisions: The TMDL Process. U.S. Environmental Protection Agency, Office of Water, Washington, D.C. EPA/440/4-91-001, April 1991.